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**MEMO ENDORSED**

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November 5, 2012

VIA FAX (914-390-4298)

The application is ☒ granted.  
— denied.

Hon. Edgardo Ramos  
United States District Court, SDNY  
300 Quarropas Street  
White Plains, NY 10601-4150

  
**Edgardo Ramos, U.S.D.J.**  
Dated: Nov. 5, 2012  
White Plains, New York

Re: Coble, et al. v. Cohen & Slamowitz, et al.  
Index: 11-CV-01037 (ER)

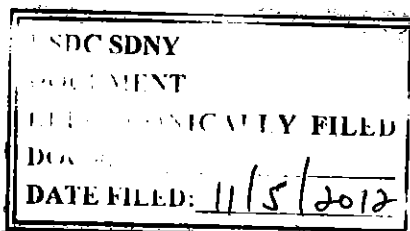
Your Honor:

I, along with co-counsel Klein, Kavanagh & Costello, LLP, represent Plaintiffs in the above-referenced FDCPA class action.

I write, on behalf of all parties, to request an extension of the deadline to conduct non-expert depositions in this case. The parties seek to extend the deadline currently set for November 17, 2012 to January 17, 2013. Your Honor previously extended this deadline (from September 10, 2012), in order to allow Plaintiffs time to review tens of thousands of pages of documents that Judge Yanthis had ordered produced, but that had been accidentally excluded from Defendants' production due to a technological glitch (Endorsed Letter dated 9/18/12, ECF #32).

The parties are engaged in on-going JAMS mediation before the Hon. Stephen Crane. A telephone conference with the mediator was scheduled for October 30<sup>th</sup>, but had to be rescheduled due to the storm. The parties are also in the process of meeting and conferring regarding outstanding ESI issues – the parties had likewise planned on holding the meet and confer last week, but for the storm, and are in the process of rescheduling.

Defendants' counsel has advised that he is currently without heat and power at his home and that dealing with this issue is significantly impacting his schedule. The undersigned's home is likewise currently without heat, power, telephone, etc.



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Notwithstanding these issues, the parties intend – assuming the Court grants the request for extension – to hold Defendants' 30(b)(6) deposition on November 19, 2012.

Following the completion of that deposition, the parties will have conducted 5 depositions, and will each have three more depositions to conduct.

The parties do not anticipate requesting additional time, beyond the extension sought in this letter.

Respectfully,



Daniel A. Schlanger

cc: Thomas Leghorn, Esq.;  
Gary Klein, Esq.;  
Shennan Kavanaugh, Esq;  
Peter T. Lane, Esq.